

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	:	CRIMINAL NO. 05-71
v.	:	DATE FILED: July 21, 2005
EDGARDO MATEO,	:	VIOLATIONS:
a/k/a "Gardo,"	:	21 U.S.C. § 846 (conspiracy to distribute
ISMAEL GONZALEZ	:	and possess with the intent to distribute
JOSEPH GLACKIN	:	cocaine - 1 count)
JESUS SANTANA,	:	21 U.S.C. § 841(a)(1) (possession with
a/k/a "Pete Santana,"	:	intent to distribute cocaine - 12 counts)
WILFREDO RIVERA	:	21 U.S.C. § 841(a)(1) (distribution of
WILLIAM C. ROSS, JR.	:	cocaine - 2 counts)
JAMES M. MORANT	:	18 U.S.C. § 2 (aiding and abetting)
JOSE SAMPLE	:	21 U.S.C. § 853 (notice of criminal
	:	forfeiture)

SECOND SUPERSEDING INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

1. From at least in or about July 2004, through in or about January 13, 2005,
in the Eastern District of Pennsylvania and elsewhere, defendants

**EDGARDO MATEO,
a/k/a "Gardo," and
ISMAEL GONZALEZ**

conspired, together and with others known and unknown to the grand jury, to knowingly and intentionally distribute and possess with the intent to distribute five kilograms or more of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(A).

MANNER AND MEANS

2. It was part of the conspiracy that defendant EDGARDO MATEO, a/k/a “Gardo,” and co-conspirator Angel Luis Perez, a/k/a “Tetine,” charged elsewhere, and others known and unknown to the grand jury, obtained cocaine from various sources in New York and Puerto Rico.

3. It was further part of the conspiracy that defendant ISMAEL GONZALEZ and co-conspirators Angel Luis Perez, a/k/a “Tetine,” Robert Ross, a/k/a “Bob,” Felix Perez-Reyes, a/k/a “Junior,” and Chad Herr, all charged elsewhere, and others known and unknown to the grand jury, traveled from the area of Lancaster, Pennsylvania to New York and Reading, Pennsylvania to obtain kilogram quantities of cocaine, and then distributed the cocaine in and around Lancaster and Harrisburg, Pennsylvania.

OVERT ACTS

In furtherance of the conspiracy the defendants, the co-conspirators, and others known and unknown to the grand jury, committed the following overt acts, among others, in the Eastern District of Pennsylvania and elsewhere:

1. On or about December 2, 2004, Angel Luis Perez traveled from the Lancaster, Pennsylvania area to New York, New York and delivered approximately \$14,000 to defendant EDGARDO MATEO as partial payment for a kilogram of cocaine that Angel Luis Perez was waiting to receive.

2. On or about December 6, 2004, co-conspirator Angel Luis Perez distributed one-half ounce of cocaine to defendant JOSEPH GLACKIN, charged in Count 2, at a restaurant near Lancaster, Pennsylvania.

3. On or about December 13, 2004, defendant EDGARDO MATEO and co-conspirator Angel Luis Perez traveled to a location in Manhattan, New York and obtained one kilogram of cocaine for approximately \$24,000.

4. On or about December 13, 2004, co-conspirator Angel Luis Perez distributed approximately 500 grams of cocaine to defendant JESUS SANTANA, a/k/a "Pete Santana," charged in Count 3, and approximately 250 grams of cocaine to defendant WILFREDO RIVERA, charged in Count 4.

5. On or about December 15, 2004, co-conspirator Angel Luis Perez distributed approximately two ounces of cocaine to defendant JAMES M. MORANT, charged in Count 5, in the Manheim, Pennsylvania area.

6. On or about December 19, 2004, defendant ISMAEL GONZALEZ orchestrated the purchase of approximately two kilograms of cocaine from an individual known to the grand jury and traveled from Lancaster, Pennsylvania with co-conspirator Angel Luis Perez to obtain the cocaine.

7. On or about December 19, 2004, co-conspirators Angel Luis Perez and Robert Ross distributed one kilogram of cocaine to defendant WILLIAM C. ROSS, JR., charged in Count 7.

8. On or about December 20, 2004, co-conspirators Angel Luis Perez and Felix Perez-Reyes traveled from Lancaster, Pennsylvania to defendant ISMAEL GONZALEZ's residence on 19th Street, Harrisburg, Pennsylvania to deliver approximately \$24,500 as payment for one of the kilograms of cocaine that defendant GONZALEZ had orchestrated the sale of, and which he and co-conspirator Angel Luis Perez had obtained in Reading, Pennsylvania on or

about December 19, 2004.

9. On or about December 20, 2004, co-conspirator Angel Luis Perez distributed one ounce of cocaine to defendant JOSE SAMPLE, charged in Count 8.

10. On or about December 21, 2004, co-conspirator Felix Perez-Reyes distributed approximately two ounces of cocaine to defendant JAMES M. MORANT, charged in Count 9.

11. On or about December 28, 2004, co-conspirator Angel Luis Perez distributed two ounces of cocaine to defendant JOSEPH GLACKIN, charged in Count 10.

12. On or about December 28, 2004, co-conspirator Angel Luis Perez distributed one ounce of cocaine to defendant JOSE SAMPLE, charged in Count 11.

13. On or about December 28, 2004, co-conspirator Angel Luis Perez distributed approximately one ounce of cocaine to defendant JESUS SANTANA, charged in Count 12.

14. On or about December 31, 2004, co-conspirator Angel Luis Perez distributed approximately 500 grams of cocaine to defendant JESUS SANTANA, charged in Count 13.

15. On or about January 13, 2005, co-conspirator Angel Luis Perez obtained approximately \$11,000 from defendant ISMAEL GONZALEZ toward the purchase of cocaine, drove to New York, picked up approximately two kilograms of cocaine from defendant EDGARDO MATEO, and transported the cocaine to the Lancaster, Pennsylvania area.

All in violation of Title 21, United States Code, Section 846.

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 6, 2004, in the Eastern District of Pennsylvania, defendant

JOSEPH GLACKIN

knowingly and intentionally possessed with the intent to distribute approximately one-half ounce of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C).

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 13, 2004, in the Eastern District of Pennsylvania,
defendant

**JESUS SANTANA,
a/k/a “Pete Santana,”**

knowingly and intentionally possessed with the intent to distribute 500 grams or more of a
mixture or substance containing a detectable amount of cocaine, a Schedule II controlled
substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(B).

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 13, 2004, in the Eastern District of Pennsylvania,
defendant

WILFREDO RIVERA

knowingly and intentionally possessed with the intent to distribute approximately 250 grams of a
mixture or substance containing a detectable amount of cocaine, a Schedule II controlled
substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C).

COUNT FIVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 15, 2004, in the Eastern District of Pennsylvania,
defendant

JAMES M. MORANT

knowingly and intentionally possessed with the intent to distribute approximately two ounces of
a mixture or substance containing a detectable amount cocaine, a Schedule II controlled
substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C).

COUNT SIX

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 19, 2004, in the Eastern District of Pennsylvania,
defendant

ISMAEL GONZALEZ

and Angel Luis Perez, charged elsewhere, knowingly and intentionally possessed with the intent to distribute, and aided and abetted the possession with intent to distribute, more than 500 grams, that is, approximately two kilograms, of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(B), and Title 18, United States Code, Section 2.

COUNT SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 19, 2004, in the Eastern District of Pennsylvania,
defendants

WILLIAM C. ROSS, JR.

and Robert Ross, charged elsewhere, knowingly and intentionally distributed, and aided and abetted the distribution of, more than 500 grams, that is, approximately two kilograms, of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(B), and Title 18, United States Code, Section 2.

COUNT EIGHT

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 20, 2004, in the Eastern District of Pennsylvania,
defendant

JOSE SAMPLE

knowingly and intentionally possessed with the intent to distribute approximately one ounce of a mixture or substance containing a detectable amount cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C).

COUNT NINE

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 21, 2004, in the Eastern District of Pennsylvania,
defendant

JAMES M. MORANT

knowingly and intentionally possessed with the intent to distribute approximately two ounces of
a mixture or substance containing a detectable amount cocaine, a Schedule II controlled
substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C).

COUNT TEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 28, 2004, in the Eastern District of Pennsylvania,
defendant

JOSEPH GLACKIN

knowingly and intentionally possessed with the intent to distribute approximately two ounces of
a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled
substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C).

COUNT ELEVEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 28, 2004, in the Eastern District of Pennsylvania,
defendant

JOSE SAMPLE

knowingly and intentionally possessed with the intent to distribute approximately one ounce of a
mixture or substance containing a detectable amount of cocaine, a Schedule II controlled
substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C).

COUNT TWELVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 28, 2004, in the Eastern District of Pennsylvania,
defendant

**JESUS SANTANA,
a/k/a "Pete Santana,"**

knowingly and intentionally possessed with the intent to distribute approximately one ounce of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C).

COUNT THIRTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 31, 2004, in the Eastern District of Pennsylvania,
defendant

**JESUS SANTANA,
a/k/a “Pete Santana,”**

knowingly and intentionally possessed with the intent to distribute more than 500 grams, that is approximately one kilogram, of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(B).

COUNT FOURTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about January 13, 2005, in the Eastern District of Pennsylvania, defendant

EDGARDO MATEO

knowingly and intentionally distributed more than 500 grams, that is, approximately two kilograms, of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(B).

COUNT FIFTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about January 13, 2005, in the Eastern District of Pennsylvania, defendant

WILFREDO RIVERA

knowingly and intentionally possessed with the intent to distribute approximately 30.2 grams of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C).

NOTICE OF CRIMINAL FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

As a result of the violations of Title 21, United States Code, Sections 846 and 841(a)(1), set forth in this Second Superseding Indictment, defendants

**EDGARDO MATEO,
ISMAEL GONZALEZ,
JOSEPH GLACKIN,
JESUS SANTANA,
a/k/a "Pete Santana,
WILFREDO RIVERA,
WILLIAM C. ROSS, JR.,
JAMES M. MORANT, and
JOSE SAMPLE**

shall forfeit to the United States:

(a) Any property constituting, or derived from, proceeds obtained as the result of such violations, and,

(b) Any property used, or intended to be used, to commit, or to facilitate the commission of such violations, including, but not limited to the following:

- (1) Monies received as a result of the distribution of cocaine;
- (2) A 2000 Dodge Durango truck, VIN 184HS28NOYF253642, bearing Pennsylvania registration number ETX4744;
- (3) A 2000 BMW, VIN WBABM5342YJP03093, bearing Pennsylvania registration number FGG2300; and,
- (4) A 1996 Cadillac sedan, VIN 1G6KD52Y8TU245755, bearing Pennsylvania registration number FRM8826.

2. If any of the property described above as being subject to forfeiture, as a

result of any act or omission of the defendants:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred, sold to, or deposited with, a third person;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of said defendants up to the value of said property listed above as being subject to forfeiture.

All pursuant to Title 21, United States Code, Section 853.

A TRUE BILL:

GRAND JURY FOREPERSON

PATRICK L. MEEHAN
United States Attorney